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Respond to NJ ☐

NY ☒

August 22, 2019

By Electronic Transmittal

Hon. Susan D. Wigenton, U.S.D.J.
United States District Court
for the District of New Jersey
Martin Luther King Building
50 Walnut Street
Newark, New Jersey 07101

Re: *Schiff Food Products Co., Inc. v. Turer Bitkisel Uretim Hayvancilik, Insaat, Su Urunleri, Orman Urunleri Tarim Gida Sanayi ve Ticaret Anonim Sirketi d/b/a Turer Bitkisel A.S. Tepecik Mah., et al.*, Case No. 18-cv-09017 (D.N.J.)

Dear Judge Wigenton:

I am counsel to the defendant in the above-captioned matter, Turer Bitkisel (“Turer”).

In connection with the recently filed Opposition of Plaintiff, Schiff Food Products, Inc. (“Schiff”), to the Motion to Dismiss by defendant Celsan Ithalat, and the Cross Motion by Turer to Vacate Default, we respectfully request the opportunity to interpose a brief Reply to what we feel are palpable inconsistencies advanced by Schiff which appear to be in direct contravention of its claims advanced in its Complaint, as well as certain factual misrepresentations proffered by Schiff in its opposition.

Aware that, as a general rule the Local Rules of the District of New Jersey do not allow for a Reply to opposition to a Cross Motion, Turer, with the Court’s indulgence, would like the opportunity to address these issues with the caveat that we would restrict our rejoinder to no

more than 5-6 pages in a letter brief. And, because my co-counsel, Petek Gunay, presently is out of the country for another week, we would ask to file our Reply no later than the 6th of September.

Thank you in advance for your time and consideration.

cc: P. Gunay, Esq.

Respectfully yours,
Louis J. Maione
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